Energy Storage Solutions

PURA Technical Meeting –

Docket No. 26-08-05 Technical Meeting #2



September 3rd, 2026

Agenda

energy storage SOLUTIONS

Program Administrators (PAs) Joint Presentation

- Introduction
- (1) recommended changes from the Program's annual evaluation report
- (2) electric vehicle (EV) Eligibility
- (3) key findings from the Annual report

Program Objectives

Docket No. 17-12-03RE03

1. Produce positive net benefits to all ratepayers,
2. Provide electrical grid benefits including resilience, peak shaving and ancillary services,
3. Foster the sustained, orderly development of a state-based electric energy storage industry,
4. Provide resilience benefits to customers in environmental justice communities or experiencing economic hardships,
5. Reduce barriers to entry for storage deployment in Connecticut,
6. Maximize the long-term environmental benefits with respect to emissions reductions, and
7. Maximize benefits to ratepayers derived from the wholesale capacity market.

(1) recommended changes from the Program’s annual evaluation report

Proposed Program Manual Updates

- **Program Manual Clean up and Clarifications**
  - Clarified “Customer,” “System Owner,” and “Participant”
  - Clarified System Owner as a default Performance Incentive recipient
  - New Institutional Payment Beneficiary concept added
  - Added defined term: “Eligible Providers”
  - Reduced redundancy and simplified language
  - Corrected typographical and consistency issues
- **Passive Dispatch Relocation to Supplement**
  - Passive Dispatch content moved to Supplement A
  - Legacy information retained for existing customers
  - Main manual made shorter and easier to use
- **Enrollment Improvements**
  - Clarified enrollment types and methods
  - Clarified ConnectedSolutions transfers
  - Updated Ownership transfer



Proposed Program Manual Updates (Cont.)

- **Insurance requirements simplified**
- **NTA and DERMS Integration**
  - New DERMS integration pathways added
  - OpenADR preferred, but alternatives may be allowed
  - Telemetry requirements clarified
  - PAs may audit data quality and timeliness
  - Penalties may apply for telemetry violations

Proposed Incentive Updates

- **Enrollment Incentive Eligibility**
  - Proposed universal 6-month timeline after Approval to Energize
  - Applies regardless of provider approval timing
  - Intended to simplify rules for customers and ratepayers
- **Performance Incentive Payments Frequency & Split**
  - **Return to two seasonal incentive payments**
    - Winter/summer split clarified
  - **Proposed rounded rates:**
    - Underserved: $50 winter / $400 summer
    - Low-income: $60 winter / $490 summer

(2) electric vehicle (EV) Eligibility

Background and Context

- Bidirectional Electric Vehicle Working Group (the Working Group or WG) formed by Program Administrators in response to Order No. 20 in PURA's Final Decision in Docket No. 25-08-05
- Invited participants included all of those required by Order No. 20, and included additional entities identified by the PAs; any other entities that asked to be added to the distribution list and participate in meetings were included
- Customized Energy Solutions (CES) was hired to facilitate the group and to draft the Final Report
- The Final Report provides relevant background information, includes relevant discussions and positions from the WG, and includes the PA's recommendations; these recommendations were heavily influenced by the WG, but ultimately reflect the positions of the Pas

Organization
Connecticut Green Bank
United Illuminating
Eversource
Office of Consumer Counsel
Department of Energy and Environmental Protection (DEEP)
Tesla
Fermata
ChargeScape
First Student
Highland
Zum
Vehicle Grid Integration Council (VGIC)
Customized Energy Solutions (CES)
General Motors
RIDE
Bidirectional Energy
EV.Energy
GridEdge Networks
Lionheart
Uplight
EnergyHub
Mobility House
World Resources Institute
Great Plains Institute (IXWG Facilitator)
People's Action for Clean Energy (PACE)
WeaveGrid
MatchaEV

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Five Primary Order 20 Directives

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1

Cross-Program Coordination

Framework for interaction between the ESS Program and other managed charging programs in Connecticut

2

Technical Requirements

EV-specific technical standards, including data and telemetry requirements

3

Program Terms & Conditions

Enrollment eligibility, contract provisions, and performance measurement

4

Incentive Structure

Analysis and recommended incentive levels

5

Light-Duty vs. Med/Heavy-Duty

Whether and how to differentiate program parameters by vehicle class

Order 25:

PURA's Final Decision in Docket No. 25-08-05 also directed the electric distribution companies "on behalf of" the interconnection working group to file a report addressing the interconnection of bidirectional EVs. The Bidirectional EV WG strove to maintain alignment with the Order 20 process, primarily through having representatives from the Pas (the EDCs and the Green Bank), the Interconnection Working Group facilitator, and CES participate in the meetings of both WGs in the lead up to both filings. Several industry representatives also participated in meetings of both working groups.

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WG Meeting Topics

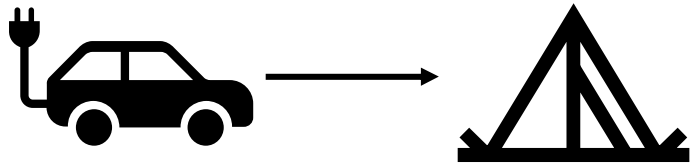
Date	Theme	Topics
3/6/2026	**Kickoff and Framing**	• Group objectives and logistics • Introduction to key concepts and definitions • Overview of Energy Storage Solutions program • Brief review of relevant Innovative Energy Solutions pilots
3/21/2026	**Bidirectional EV Technology Requirements by Vehicle Class**	• Technical characteristics of bidirectional EVs by vehicle class; ESS participation readiness • Vehicle, charger, and site-level requirements for bidirectional operation • Integration of IES pilot early lessons • Potential for phased inclusion of bidirectional EVs into ESS by vehicle class
4/16/2026	**Technical Integration of Bidirectional EVs into ESS**	• How ESS technical requirements must adapt for bidirectional EVs; data, telemetry, and verification needs • DERMS capabilities, constraints, and potential workarounds • Privacy, cybersecurity, and data access considerations
5/7/2026	**Cross-Program Participation**	• Overlap between ESS Program and other state EV programs, particularly managed charging • Distinguishing load reduction vs. energy discharge across programs • Considerations across programs to avoid double-counting • Identification of relevant tariffs (enabling and/or potential conflicts)
5/29/2026	**Bidirectional EV Incentives**	• Appropriate incentive structure for bidirectional EV participation in ESS • Upfront versus performance-based incentives • Incentives tied to EVSE, vehicles, or integrated systems
6/12/2026	**Draft Recommendations Review**	• Present and discuss draft recommendations • Discussion of open items • Next steps on report and filing with PURA

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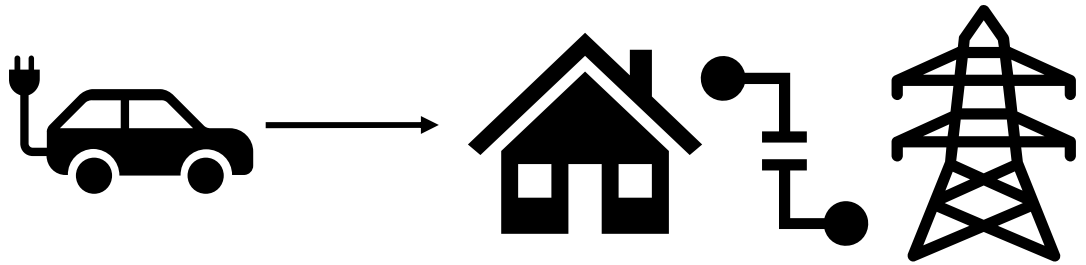
Bidirectional EV Market - Context

Bidirectional EVs can generally be categorized as:

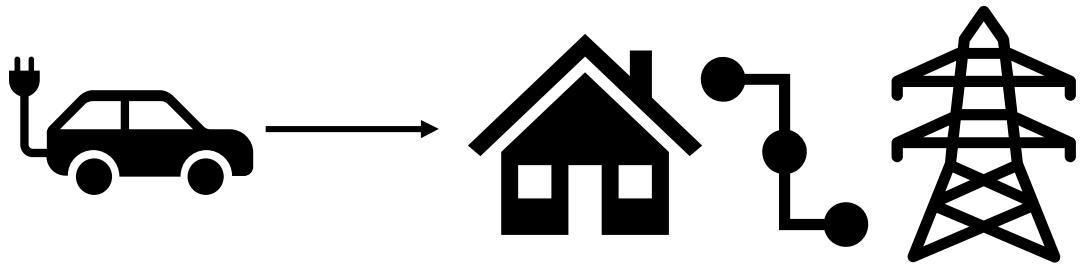
Vehicle to Load (V2L) – vehicle powers a load directly – no connection go the grid



Vehicle to Home or Building (V2H or V2B) – vehicle can power building loads, but only when disconnected from the grid, e.g., during outages



Vehicle to Grid (V2G) – vehicle can discharge energy in parallel to the grid (i.e., while home/building is still connected to the grid)

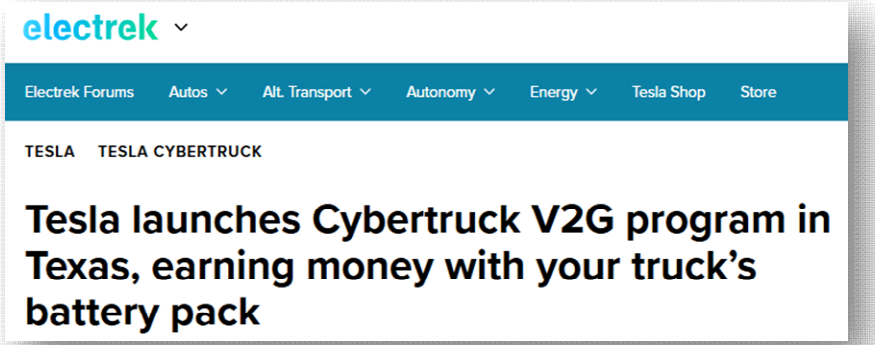


The WG only focused on these systems, as pure V2G cannot produce most of the benefits the ESS Program seeks to produce

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Bidirectional EV Market - Context

- V2G still nascent – have been limited demonstrations; attempts to operate at scale much more recent
- Nascency of V2G apparent in many material ways:
  - Applicable standards (e.g., UL 1741 SC and ISO 15118-20) are evolving, with limited equipment tested to the most recent standards
  - Pilots demonstrate implementation challenges (e.g., interconnection, EV/EVSE interoperability, etc.)
  - Clear inventory of V2G-capable EVs and EVSE can be challenging to compile, as new models are rolled out and capabilities of current EVs can change (e.g., GM announcement)
- Still, V2G rapidly developing
  - Standards that had previously not specifically address bidirectional flows updated to account for them
  - Significant volume of pilots and demonstrations
  - Supportive infrastructure (e.g., guidance on interconnection) being put into place



February 11, 2026



May 21, 2026



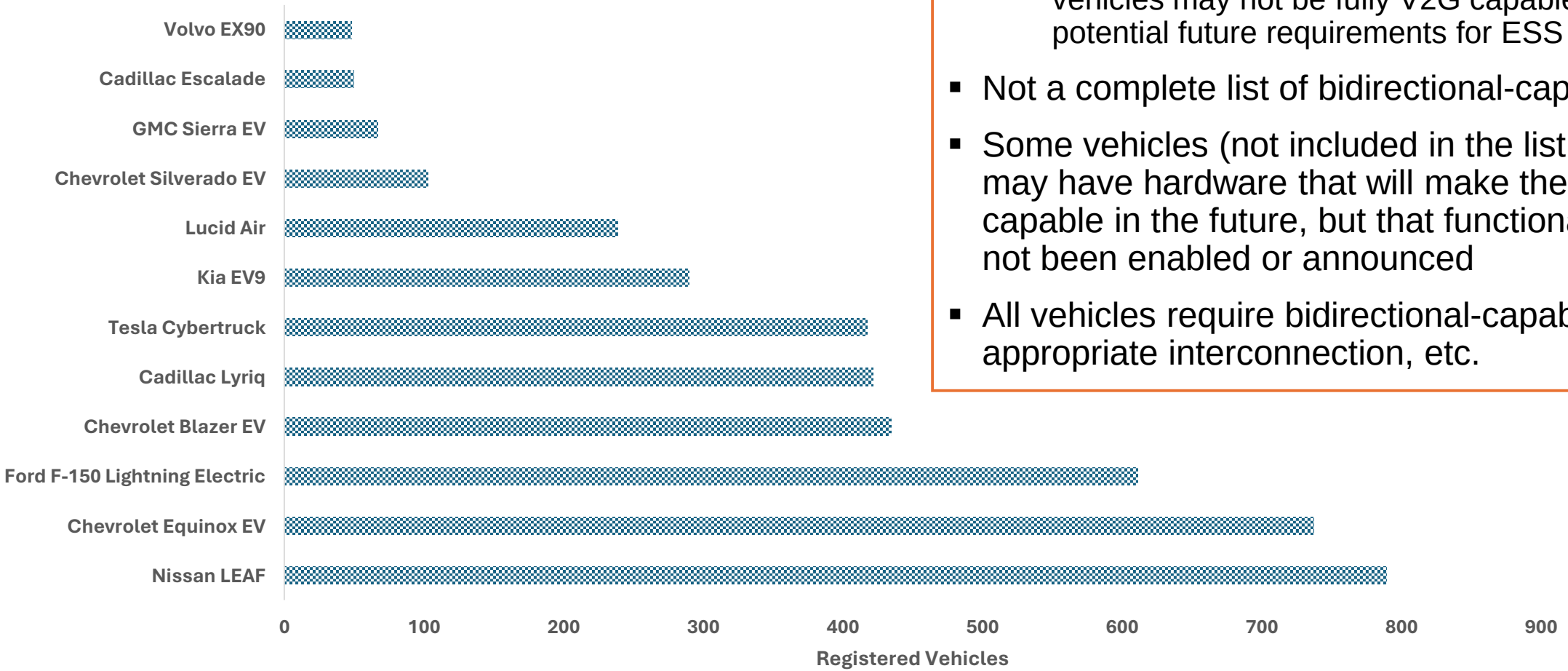
September 269, 2025

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Bidirectional-Capable EVs

Top Bidirectional-Capable EVs in Connecticut

Numbers of EVs Registered as of 12/31/2025



- Based on models with announced or demonstrated V2H/V2G capabilities
  - Note – this is an illustrative list – some of these vehicles may not be fully V2G capable or meet potential future requirements for ESS integration
- Not a complete list of bidirectional-capable EVs
- Some vehicles (not included in the list to left) may have hardware that will make them V2G capable in the future, but that functionality has not been enabled or announced
- All vehicles require bidirectional-capable EVSE, appropriate interconnection, etc.

Source - *CT Electric Vehicle Registration Data: Link*

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Categorizing Bidirectional EVs

- Goals of categorization:
  - Understand and characterize market potential, including characteristics such as:
    - Vehicle physical characteristics (battery size, AC vs. DC coupling, etc.)
    - Vehicle use and charging patterns
    - Customer motivations and barrier
  - Potential to use in differentiating program design and/or incentive levels
- WG discussed primary ways to categorize bidirectional EVs:
  - Light-duty (LD) vs. Medium/Heavy Duty (MHD)
    - Definition: LD – up to 8,500 Gross Vehicle Weight Rating (GVWR); MHD: GVWR of 8,501 and above
    - Definition used by EPA, CA Air Resource Board, and in CT's Managed Charging Program and EV Charging Tariffs
    - Challenge: distinction does not always cleanly align with other useful characterizations (e.g., personal/residential use vs. commercial use)
  - Residential vs. commercial
    - Can be identified by rate class of meter
    - May better help identify usage patterns

- **WG conclusion:** residential vs. commercial generally likely to be a more useful distinction, but both may be useful; Managed Charging program uses both definitions to categorize participants

Examples of Use Patterns for School Buses

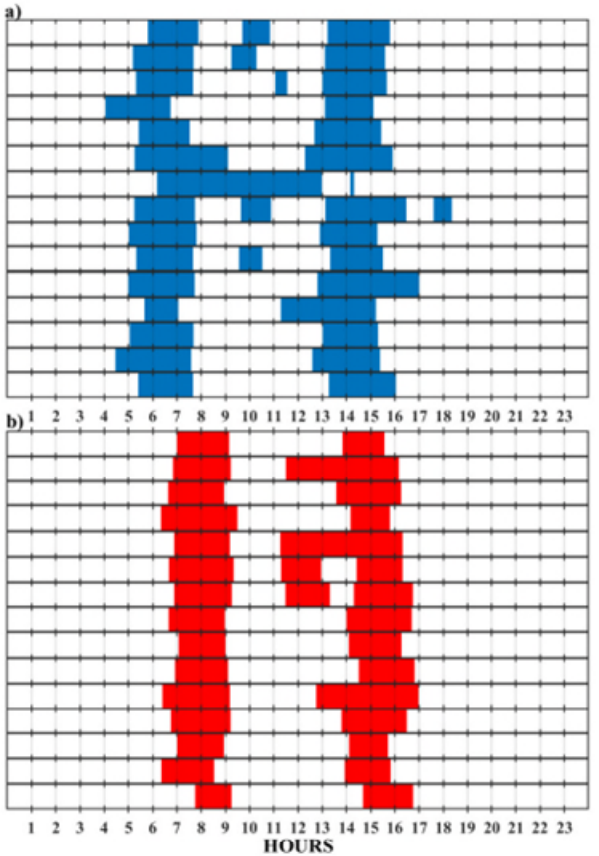


Figure 5: Bus-level operating times (Monday) for a) Fleet 40 (CO) and b) Fleet 41 (WA), respectively.

https://docs.nrel.gov/docs/fy24osti/87322.pdf

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Enrollment, Qualification Approach

- WG discussed overall approach to enrollment, i.e., enrolling EVSE, EVs or specific pairing of EVSE and EV
- **WG recommendation: ESS Program should enroll EVSE**
- Rationale:
  - EVSE is the stationary piece of equipment, and, with some limited exceptions (e.g., DC-coupled systems), the EVSE is the piece of equipment that is interconnected (not the EV)
  - Including EV in enrollment would introduce significant administrative complexity, e.g.: if customer purchases new EV, would they have to re-enroll? Would they be subject to incentives in place when they originally enrolled or after new EV purchase?
  - Commercial sites with multiple EVSE and EVs – only allowing specific EV-EVSE pairing would introduce practical challenge that may limit participation
- Primary challenge: lack of information on EVs connecting to enrolled EVSE would make evaluation more challenging
  - Construct 5 does not require the PAs to know nameplate kWh, as Passive events do not apply/are not scored
  - Still, not having information on size of EV battery limits ability to evaluate the program (e.g., understand how vehicles are performing relative to hypothetical, idealized performance)
    - Preliminary information suggests that stored kWh would still be available in telemetry data, providing valuable data points

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PA Recommendations: Key Eligibility Criteria (1 of 2)

- **Behind-the-meter:**
  - ESS program currently limited to BTM installations
  - Bidirectional EVSE, by definition, also draw energy to charge EVs
  - **PA Recommendation:** Any bidirectional EV/EVSE should be considered BTM, even if the EV itself is the only load behind the meter; note, the EV charging tariffs require that EV loads be separately metered

- **Islanding:**
  - ESS program currently requires that systems are capable of islading and providing back-up power during outages
  - Resiliency a significant driver for some ESS installations; note likely to as consistently be the case for bidirectional EVs, especially as there may be limited on-site load for some applications, like school bus depots
  - **PA Recommendation:** islanding requirement be waived for bidirectional EVs; if/when residential

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PA Recommendations: Key Eligibility Criteria (2 of 2)

- **Energy export:**
  - ESS program currently requires that batteries receive export approval as part of their PTO; this has not always been the case
  - **PA Recommendation**: Maintain this requirement, but consider revisiting if/when residential sites become eligible for ESS
- **C&I sizing limitation**
  - ESS program currently limits incentives for C&I to greater of 150% of customer's annual peak demand or 2 MW
  - In practice, most sites will, at some point, charge at a rate equal or greater to what they may discharge; still, the structure of the sizing limitation could incentivize customers to charge at full power when they might otherwise have mitigated charging power
  - **PA Recommendation:** assume that charging rate is the customer's max demand, effectively ensuring that all bidirectional EV applications will meet the 150% criterion

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Qualified Product List - Purpose and Current ESS Approach

- Objectives/Purpose of a QPL:
  - Provides greater clarity to customers and contractors and helps them more quickly select equipment
  - Streamlines enrollment process; equipment on the QPL already screened for applicable technical eligibility requirements
- Current approach
  - Qualification is based on combination of battery and inverter
  - To be added to list, resources must meet receive certifications for UL 1973, UL 1741 SA, and UL 9540 (program materials include other requirements “as applicable”, not checked for every project/piece of equipment)
  - To be added to list, applicants fill out the New Technology Application
- Existing EVSE QPLs:
  - California Energy Commission bidirectional-capable EVSE
  - EPRI EVSE vetted product list

PA Recommendation

- QPL is just for eligible EVSE (or, based on discussion above, other stationary pieces of equipment installed at the site), not for the EV. This would still be the case, even in instances in which EVSE/EV are 1741 SB certified as a composite distributed energy resources (DER).
- Would be based on applicable standards (next slide).
- QPL does not attempt to address interoperability; the Program Administrators can refer to other existing resources and/or to OEMs and aggregators for documentation on interoperability.
- QPL would be specific to ESS, in order to include DERMS integration as a criterion (in line with current QPL), though it may reference or draw on other QPLs.

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EVSE Standards and Certifications Recommendations

Standard / Certification	Current ESS Requirement?	Description	Applicable to EVSE?	Applicable to EV?	PA Recommendation
UL 1741 SB	Proposed in Aug. 2026 filing	Enhanced inverter/grid standard with advanced functions. Already required by EDCs for interconnection. Applicable pathway for DC-coupled EVSE.	Yes	No	**Yes – Required for DC-coupled EVSE as well as for stationary storage.**
UL 1741 SC	No	Extension of UL 1741 designed for mobile, onboard vehicle inverters (AC-coupled systems). Requires paired EV to be SAE J3072 certified. Finalized in May 2026.	Yes (AC-coupled)	No	**Yes – Required for AC-coupled EVSE**
UL 1741 SB CRD	No	Pathway for jointly certifying a specific EV-EVSE pair as a composite DER under the SB framework. Available now; used by some manufacturers (e.g., Tesla).	Yes	Yes (paired)	**Yes – Permitted as alternative pathway for composite DER pairings (AC-coupled)**
SAE J3072	No	Defines bidirectional energy transfer requirements for plug-in EVs paired with UL 1741 SC EVSE.	Yes (AC-coupled)	Yes (AC-coupled)	**Yes – Required for EVs paired with UL 1741 SC EVSE; not a standalone requirement**
UL 9741	No	Safety standard for bidirectional EVSE capable of exporting power to the grid or premises.	Yes	No	**Yes – Required**
UL 2594	No	Safety standard for Level 1 and Level 2 AC EVSE.	Yes (AC)	No	**Yes – Required for Level 1/2 AC chargers**
UL 2202	No	Safety standard for DC fast charging EVSE.	Yes (DC)	No	**Yes – Required for DC fast chargers**
UL 2580	No	Safety standard for EV propulsion battery packs.	No	Yes	No – Vehicle-level; outside ESS Program scope
ISO 26262	No	Functional safety standard for electrical/electronic systems in road vehicles.	No	Yes	No – Vehicle-level; outside ESS Program scope
ISO 15118-20	No	Governs EV-to-EVSE communication for bidirectional power transfer.	Yes	Yes (partial)	**Yes – Required, with PA discretion to grant exceptions where certification ecosystem not yet mature**
OCPP 2.1	No	Protocol governing EVSE-to-management-system communication. Version 2.1 adds bidirectional functionality but not yet widely adopted. Divergent WG views.	Yes	Partial	No – Not recommended at this time; may revisit as adoption matures
IEEE 2030.5	No	Smart Energy Profile protocol for utility-to-DER communication and demand response.	Yes	Yes	No – Not recommended; EDCs may address independently.
ISO/SAE 21434	No	Cybersecurity engineering standard for road vehicles.	Yes	Yes	No – Vehicle cybersecurity; outside ESS Program scope

Note – list above does not include existing ESS requirements

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Evaluation of Cross-Program Participation

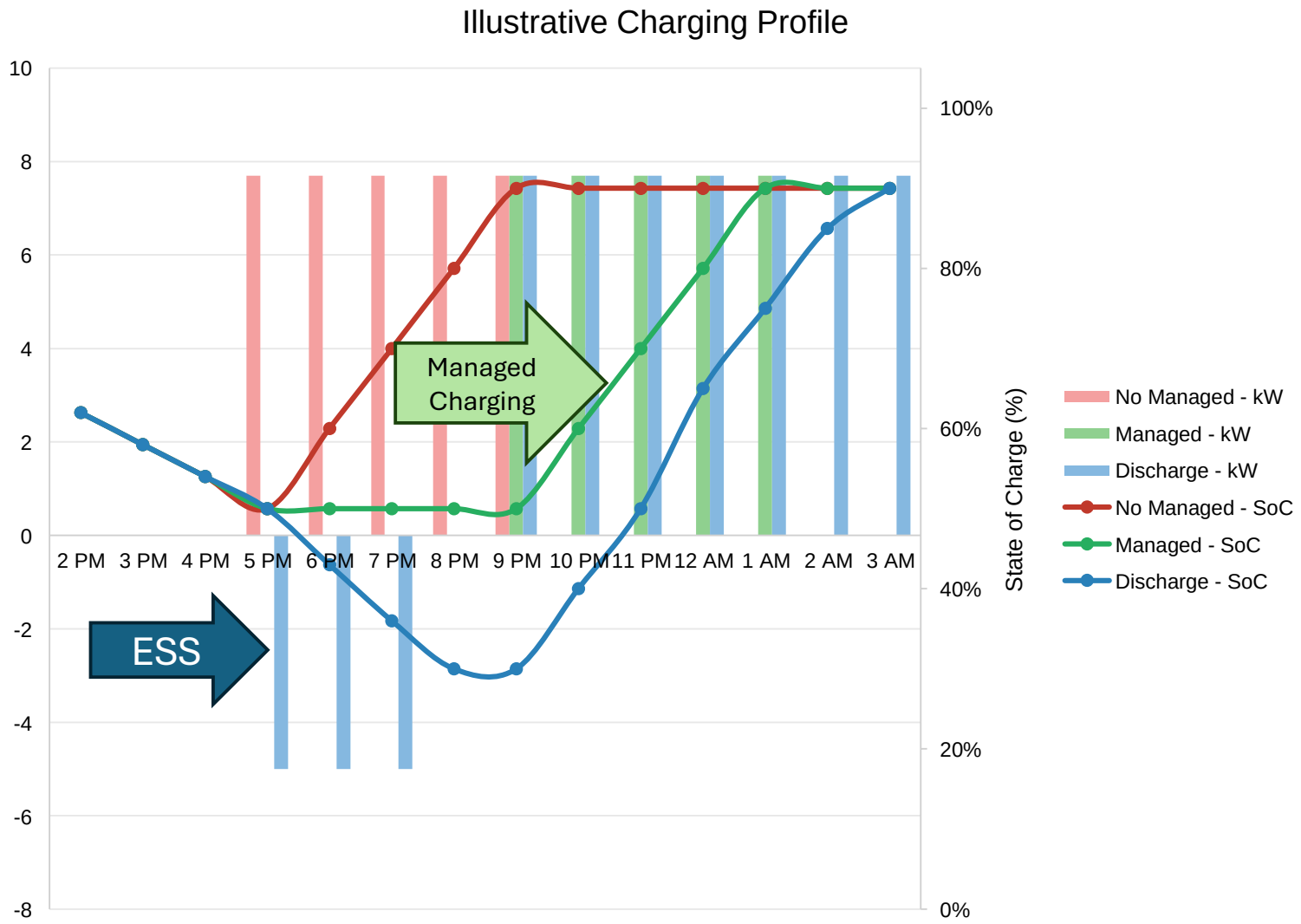
- Primary considerations:
  - Conflicting program goals, definitions, or dispatch signals
  - Double-counting of ratepayer benefits
  - Implications for ESS incentive design
  - Gaps in programs for certain vehicle types or participant types
  - Customer experience
- Programs/policies considered:
  - Managed Charging and Make Ready incentives → minimal direct conflict, but implementation challenges
  - Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) → no conflict
  - C&I EV Charging Tariff → no conflict, though higher volumetric charges for low-load EVSE could worsen economics of cycling battery
  - PURA MHD Program → potential for similar considerations as Managed Charging, subject to specifics of how program is implemented



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Managed Charging Interactions

- Primary challenge – implementation. Examples:
  - Customer enrollment – separate or integrated
  - Ensuring coordinated dispatch taking into account customer needs first, as well as requirements/incentives of each program
  - Ensuring customers retain ability to use EV as needed
- Potential issues
  - Managed Charging peak hours (3pm–9pm) may affect ability of some EVs to charge in advance of an ESS event, though this varies significantly based on vehicle usage
  - ESS participation could affect baseline used to calculate impact of Managed Charging program
  - Potential increase in issues stemming from timer peaks



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Bidirectional EV – Incremental Cost Drivers

Upfront Costs

- Incremental EVSE cost → bidirectional EVSE often come with a substantial incremental cost
- Interconnection cost → higher interconnection cost or interconnection cost when there otherwise would have been no interconnection cost
- Incremental labor (incl. project management for greater complexity)
- Other (e.g., other equipment, monitoring, etc.)

Significant Impact

Charging Costs

- Increased cycling increases net kWh consumed
- TOU implications can increase or decrease impact
- Assume no impact on demand charges

Likely Modest Impact

Impact on Battery

- Increased cycling could affect warranty, increase degradation
- For perspective, an electric school bus will likely cycle well over 100 full equivalent cycles annually; assuming 25% of 200 nameplate kWh discharged per event and participation in 20 events per season, this would be equivalent to about 5 cycles

Likely Minimal Impact

Challenge – Limited Data on Incremental Costs Available

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Potential Incentive Structures

- Most common (and history in ESS program):
  - Upfront incentive w/ performance obligation
  - Upfront/enrollment incentive w/ no obligation
  - Performance incentive
- Other potential approaches:
  - Fixed annual payments w/ minimum participation requirements
  - Incentive for vehicle being plugged in during designated hours
  - Others?
- Consider differentiation between residential, commercial fleet, and commercial MHD

Challenge with upfront incentive: What should payment be based on?

- Current upfront incentives are per kWh of installed capacity
- There is significant uncertainty and variation in expected bidirectional EV performance:
  - How many events will they participate in?
  - How much of total kWh discharged during events?
- Given this uncertainty, is an upfront incentive appropriate? If so, how could this uncertainty be addressed?

Recommendation: Use Construct 5 Structure

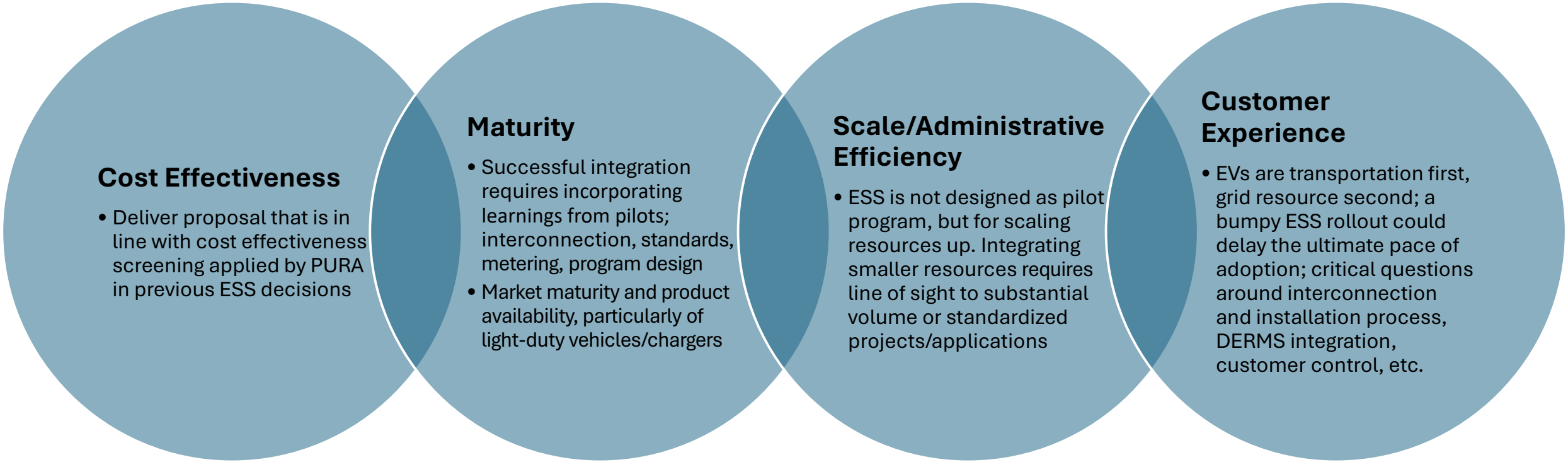
Rationale: alternative approaches create ratepayer risks that are challenging to mitigate, alternative approaches introduce additional implementation complexity, and establishing incentive rates w/o reliable cost information is challenging

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Potential Incentive Structures

Program Administrator Recommendations - Context

- Program Administrators (PAs) discussed their recommended approach to integrating bidirectional EVs and EVSE into the Energy Storage Solutions (ESS) program
- **Primary objective:** roadmap for bidirectional EVs that works for customers, installers, regulators, PAs, and other stakeholders, ensuring a smooth, sustained rollout
- **Key considerations**:



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PA Draft Recommendations

Note: These recommendations reflect the PAs *initial* recommendations. The PAs intend to evaluate and potentially expand eligibility in subsequent program years.

Commercial – Advance Now

EVSE Eligibility Criteria:

- Must be installed behind a meter on a commercial rate
- Must have minimum discharge rating of at least 20 kW per port
- Cannot be enrolled in a Light Duty Managed Charging Programs

Incentive Structure:

- Performance-based incentives follow current Small/Medium C&I performance rate ($325/kW years 1-5, $175kW years 6-10)
- No enrollment incentive

Residential – Pending Pilot

EVSE Eligibility Criteria:

- Must be installed behind a meter on a residential rate
- Cannot be enrolled in a Light Duty Managed Charging Programs (pending results of pilots and technical compatibility)

Incentive Structure:

- Performance-based incentives follow current Standard/Underserved/Low Income structure
- No enrollment incentive

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Key Milestones for Expanded EV Enrollment

Completion of Bidirectional Energy IES Pilot

- Assess vehicle availability, performance, implementation challenges (e.g., interconnection, metering, customer enrollment)

Further learnings from MassCEC V2X Demonstration

- Similar to Bidirectional Energy findings, but with wider array of vehicles, potentially yielding additional, unique findings

Establishment of clear path to resolving ESS/Managed Charging dual participation

- Address DERMS provider strategy, customer experience, integrated charging/discharging strategy, strategy for baseline adjustments for Managed Charging

Successful implementation and application of updated interconnection guidelines

- Complete interconnection of bidirectional EVs, assess timeline, make further adjustments as necessary

Clarification on metering and other implications of related DG policies

- Clarify metering requirements and potential outstanding questions related to interplay between ESS/energy storage and relevant DG policies (see challenges identified in Bidirectional Energy and GridEdge Networks IES pilots)

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Additional Recommendations - Opportunities for Progress

1. PURA should consider establishing a V2G-docket

2. IES Bidirectional Energy Pilot extension remains pending – EDCs recommend granting this extension

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(3) key findings from the Annual EM&V report

ESS – Year 6 - Overview

Key Activities

- Updated data collection process
- Improvements to ESS data dashboard (new metrics, substantially reduced data latency)
- Started enrolling projects under Construct 5
- PAs led Bidirectional EV Working Group, filing recommendations for incorporating bidirectional EVs into the ESS program

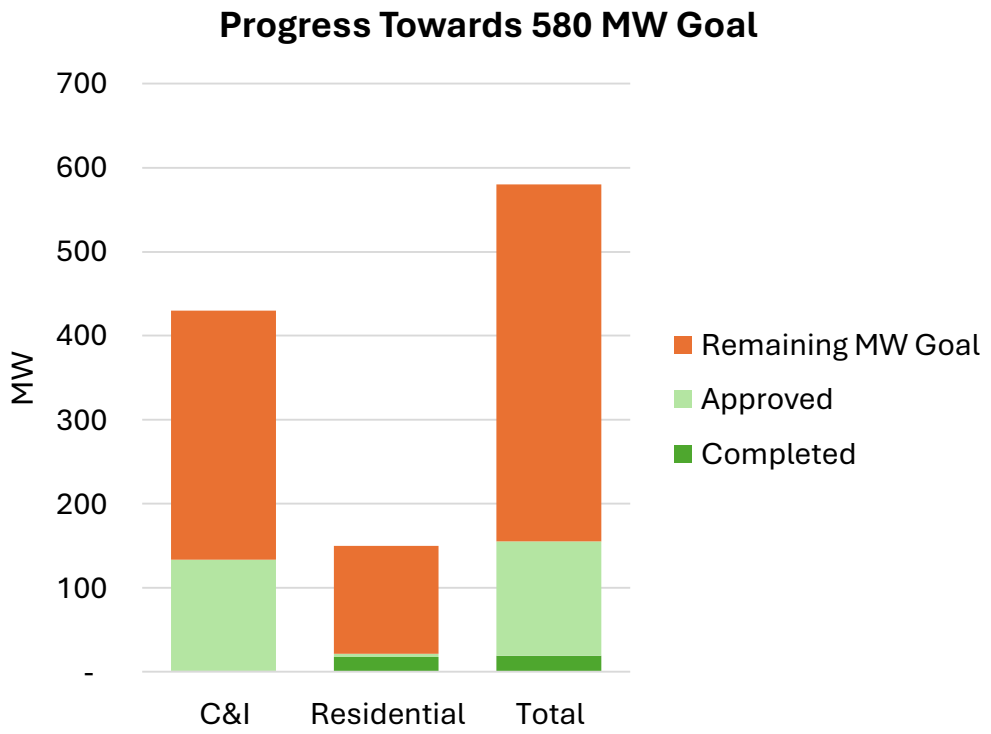
Comparison of Key Metrics

Metric	Year 5 Report	Year 6 Report	% change
Approved Residential (MW)	4.57	3.84	-16%
Completed Residential (MW)	4.88	17.56	260%
Approved C&I (MW)	144.32	132.32	-8%
Completed C&I (MW)	0.75	1.29	72%
Approved Total (MW)	148.89	136.16	-9%
Completed Total (MW)	5.63	18.85	235%
Program RIM	1.69	1.55	-8%
Program PCT	0.96	0.9	-6%

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Key Finding 1: Slow Progress Towards Overall MW Goals

- **Finding: Based on current trajectory, program appears unlikely to achieve its 580 MW by 2030 goal**
- Additional information:
  - Residential deployment is steady, though still not likely to meet residential target (150 MW) by 2030
  - C&I deployment is more concerning:
    - Pace of deployment (i.e., projects reaching commercial operations) extremely slow
    - Rate of application cancellations/withdrawals exceeds new applications
    - As of date of report, no new C&I applications under Construct 5
- Highest priority should be identifying how to improve probability of existing approved projects moving to completion
- Still, achieving 430 MW target by 2030 extremely unlikely without modifications to the program or significant exogenous changes (e.g., precipitous decline in costs)

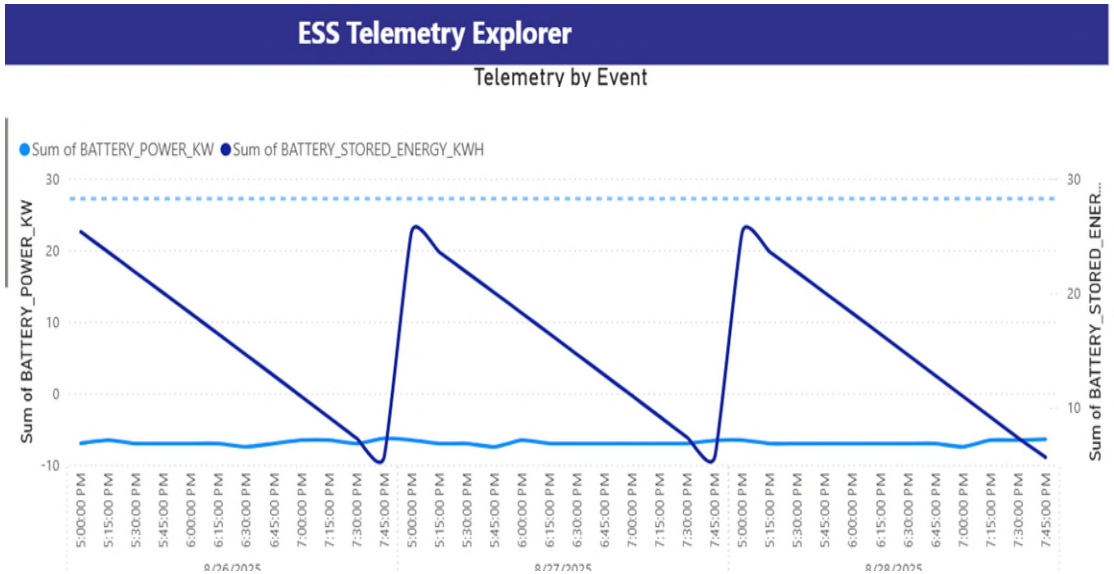


Metric	Year 5 Report	Year 6 Report	% change
C&I Approved	144.32	132.32	-8%
C&I Completed	0.75	1.29	72%
C&I Approved + Completed	145.07	133.61	-8%

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Key Finding 2: Data Quality

- **Finding: Data processing and resulting quality improved significantly**
- Additional information:
  - Changes in how data is transmitted (discussed in previous technical session) have decreased data latency, enabling more real-time QC
  - Green Bank (with some support from CES) has implemented improvements to data monitoring dashboards, enhancing ability to identify data quality and performance issues more quickly
  - PAs appear to have been largely successful in working with OEMs and DERMS providers to address identified issues
  - Improvement in data quality is apparent in evaluated data set
  - Likely that data QC and performance monitoring has led to improved performance as well
- Areas for continued improvement:
  - Some challenges for evaluation tied to missing data for some projects (including those that self-enroll)
  - Some inconsistencies between nameplate kW and kWh values and telemetry data



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Key Finding 3: System Performance

- **Finding: System performance during both active and passive events has improved**
- Additional information:
  - Participation rates (measured as % of systems with a verified DERMS connection as of the date of an event that have net energy discharge over the course of an event) have improved
  - Performance of participants (measured as % of maximum hypothetical kW performance during an event, based on starting kWh) has also improved
  - Storm protection settings likely a significant contributor to gap between reported and maximum hypothetical participation rates and performance
- Areas for continued improvement:
  - Data quality issues for some C&I systems challenges drawing broad conclusions about C&I performance
  - Significant variation in performance across OEMs represents challenge and opportunity
  - Further improvement may require examining storm protection settings, which vary by OEM

Metric	Year 5 Report	Year 6 Report	% change
Summer Active Resi Participation Rate	88%	90%	2%
Summer Active Resi Performance (% of expected kW)	59%	67%	14%
Winter Resi Participation Rate	64%	93%	45%
Winter Resi Performance (% of expected kW)	54%	66%	22%
Summer Passive Resi Participation Rate	80%	91%	14%
Summer Passive Resi Performance (% of expected kW)	63%	67%	6%
Summer Active C&I Participation Rate	79%	78%	-1%
Summer Active C&I Performance (% of expected kW)	34%	64%	88%
Winter C&I Participation Rate	75%	100%	33%
Winter C&I Performance (% of expected kW)	51%	61%	20%
Summer Passive C&I Participation Rate	73%	86%	18%
Summer Passive C&I Performance (% of expected kW)	52%	67%	29%

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Thank You!